

EXHIBIT L

Howard C. Jordi, Ph.D.

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION
Master File No. 2:12-MD-02327

IN RE: ETHICON, INC. MDL No. 2327
PELVIC REPAIR SYSTEM,
PRODUCTS LIABILITY
LITIGATION

This Document Relates to:
Carolyn Lewis, Et Al v. Ethicon, Inc.
Case No. 2:12-CV-04301

IN THE DISTRICT COURT, 95th JUDICIAL DISTRICT
DALLAS COUNTY, TEXAS

Linda Batiste,
Plaintiff,

v.

John Robert McNabb, M.D.,
Johnson & Johnson and Ethicon, Inc.,
Defendants.

Cause No.
DC-12-14350

DEPOSITION OF HOWARD C. JORDI, Ph.D.
Wednesday, October 30th, 2013
9:05 a.m.

Held At:

Jordi Lab
200 Gilbert Street
Mansfield, Massachusetts

REPORTED BY:

Maureen O'Connor Pollard, RPR, CLR, CSR #149108

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1 our best judgment. I think in many cases the
2 damage is caused by both.

3 Q. So just so I'm clear, your opinion
4 that the mesh that you've analyzed in the
5 explants has undergone environmental stress
6 cracking is due to your visual observation on
7 the SEM images and the DSC data, correct?

8 A. Right.

9 Q. Is there any other information that
10 you determined from your report, or your work in
11 this case, that you rely upon for your opinion
12 that the explanted mesh underwent environmental
13 stress cracking?

14 A. Any other data from my report, that
15 was the question?

16 Q. Yes.

17 A. No.

18 Q. All right. Do you agree that pelvic
19 organ prolapse is well-known for its high
20 resistance to environmental stress cracking?

21 A. Yes. But the fact of the matter is
22 the Delta H is going down, so something is
23 causing that amorphous region to increase.

24 Q. And the Delta H you're talking about
25 is the melting point as measured by the DSC

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1 measurements, correct?

2 A. The melting point goes down, and the
3 Delta H at melt goes down. And again, there's
4 variability from sample to sample. So some
5 samples have more component of potential, I'll
6 describe it as potential environmental stress
7 cracking, and other samples from less potential.
8 The same way I would describe the lack of
9 antioxidant to be potential oxidation.

10 In all cases we are seeing the
11 degradation through SEM of the polypropylene.
12 That's just a fact. And we know it's
13 polypropylene because the infrared spectrum is
14 that of polypropylene, the flakes.

15 Q. What's crazing?

16 A. Small cracks.

17 Q. What does crazing have to do with
18 environmental stress cracking?

19 A. Well, it's the start of the process.
20 When you have a little bit of cholesterol ester
21 you have just little cracks, little start, it's
22 moving in, the process is beginning.

23 Q. Are you familiar with a concept known
24 as crack initiation?

25 A. That's what crazing does, is initiates

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1 COMMONWEALTH OF MASSACHUSETTS)
2 SUFFOLK, SS.)

3 I, MAUREEN O'CONNOR POLLARD, RPR, CLR,
4 and Notary Public in and for the Commonwealth of
5 Massachusetts, do certify that on the 30th day
6 of October, 2013, at 9:05 o'clock, the person
7 above-named was duly sworn to testify to the
8 truth of their knowledge, and examined, and such
9 examination reduced to typewriting under my
10 direction, and is a true record of the testimony
11 given by the witness. I further certify that I
12 am neither attorney, related or employed by any
13 of the parties to this action, and that I am not
14 a relative or employee of any attorney employed
15 by the parties hereto, or financially interested
16 in the action.

17 In witness whereof, I have hereunto
18 set my hand this 1st day of November, 2013.

19

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21 _____
22 MAUREEN O'CONNOR POLLARD, NOTARY PUBLIC
23 Realtime Systems Administrator
24 CSR #149108

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